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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CAROL CAMPANICO,
Plaintiff,
v.
JPMORGAN CHASE BANK, N.A. and
EARLY WARNING SERVICES, LLC.,
Defendants.

Case No. 2:23-cv-02039-MMD-NJK

**DEFENDANT EARLY WARNING
SERVICES, LLC'S CONSENT MOTION
FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT
(FIRST REQUEST)**

Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada, Defendant Early Warning Services, LLC (“EWS”) files this Consent Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff Carol Campanico’s (“Plaintiff”) Complaint, showing the Court as follows:

1. Plaintiff’s Complaint was filed on December 8, 2023.
2. EWS was served with the Complaint on December 14, 2023.
3. EWS deadline to answer or otherwise respond to Plaintiff’s Complaint is January 4, 2024.
4. The undersigned counsel for EWS was recently retained in this action. Additional time to respond is necessary to allow EWS and its counsel to thoroughly investigate the claims and allegations in Plaintiff’s Complaint and to formulate an appropriate response to the Complaint.

5. Therefore, EWS requests an additional thirty (30) days, up to and including February 2, 2024, to formulate a response to Plaintiff's Complaint.

6. Plaintiff has consented to EWS's request for an extension.

7. This is the first request by EWS seeking such an extension.

8. An additional thirty (30) days for EWS to answer or respond to Plaintiff's Complaint will not prejudice any party.

In consideration of the foregoing, and for good cause shown, Defendant Early Warning Services, LLC respectfully requests that the Court extend the deadline to file an answer or otherwise respond to Plaintiff's Complaint up to and including to February 2, 2024.

Dated this 22nd day of December, 2023.

/s/ Sean B. Kirby

Sean B. Kirby, Esq.

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Attorney for Defendant

*Attorney for Defendant
Early Warning Services LLC*

IT IS SO ORDERED

Dated: December 27, 2023

Nancy J. Koppe
United States Magistrate Judge